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10 **UNITED STATES DISTRICT COURT**
11 **EASTERN DISTRICT OF CALIFORNIA**
12 **SACRAMENTO DIVISION**

13
14 NATALIA TSUBERA, } Case No.: 2:24-cv-01789-AC
15 Plaintiff, } STIPULATION AND [PROPOSED] ORDER
16 vs. } FOR AN EXTENSION OF TIME
17 COMMISSIONER OF SOCIAL SECURITY,)
18 Defendant. }
19

20
21 Pending the Court's approval, the parties hereby stipulate that the time for Defendant to
22 respond to Plaintiff's Motion for Summary Judgment be extended twenty-eight (28) days from
23 November 18, 2024, up to and including December 16, 2024.

24 This is Defendant's first request for an extension, and it is made with good cause. This
25 case was recently reassigned to undersigned counsel for Defendant, along with two other briefs,
26 all of which are due in mid to late-November 2024. Moreover, counsel already has five other
27 briefs due by early December and has preplanned leave for one week in late November. Thus,
28

1 Defendant requires an extension in this case, and may require extensions in other cases, and
2 requests this extension in good faith and with no intent to delay these proceedings unnecessarily.

3 The parties further stipulate that the Court's Scheduling Order shall be modified
4 accordingly.

5 Respectfully submitted,

6 Dated: October 29, 2024

/s/ Jesse S. Kaplan*

(*as authorized via e-mail on October 29, 2024)
7 JESSE S. KAPLAN
8 Attorney for Plaintiff

9 Dated: October 29, 2024

10 PHILLIP A. TALBERT
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14 By: /s/ Mary Tsai
15 MARY TSAI
16 Special Assistant U.S. Attorney
17 Office of Program Litigation, Office 7

18 Attorneys for Defendant

19 **ORDER**

20 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an
21 extension, up to and including December 16, 2024, to respond to Plaintiff's Motion for Summary
22 Judgment.

23 DATED: October 30, 2024

24 
ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE